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9 Attorneys for Defendant Securitas  
10 Security Services USA, Inc.

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BALBIR SINGH SOHI,

Plaintiff,

vs.

GREYHOUND LINES, INC. a Washington  
Corporation; SECURITAS SECURITY  
SERVICES USA, INC. a Washington  
Corporation,

Defendants.

NO.

NOTICE OF REMOVAL

FROM THE SUPERIOR COURT OF  
THE STATE OF WASHINGTON FOR  
KING COUNTY, CAUSE NO.  
07-2-25183-9 SEA

TO: THE CLERK, UNITED STATES DISTRICT COURT FOR THE WESTERN  
DISTRICT OF WASHINGTON AT SEATTLE

Defendant Securitas Security Services USA, Inc. ("Securitas") files this Notice of  
Removal to remove this action to the United States District Court for the Western District of  
Washington pursuant to 28 U.S.C. § 1331.

On July 31, 2007, Plaintiff Balbir Singh Sohi filed a Complaint for damages in the King  
County Superior Court. That action was assigned Cause No. 07-2-25183-9 SEA. Plaintiff  
served a copy of the Summons and Complaint on Defendant Securitas on August 2, 2007. (See  
Declaration of Dana A. Henderson, "Henderson Dec." ¶ 2, Exh. A, Decl. of Service.) Pursuant

1 to 28 U.S.C. § 1446(a), copies of the summons and complaint are attached. (Henderson Dec.,  
2 ¶¶ 3-4, and Exhs. B and C.)

3 In compliance with 28 U.S.C. § 1446(d), a copy of the Notice of Removal to Clerk of  
4 Superior Court that will be filed with the King County Superior Court. (Henderson Dec. ¶ 5,  
5 Exh. D.) Securitas has also provided written notice of this filing to Plaintiff as required under  
6 the same statute. (Henderson Dec., ¶ 6, and Exh. E.)

7 **A. Basis for Jurisdiction in Federal Court**

8 The United States District Court has original jurisdiction of the subject matter of this  
9 action under 28 U.S.C. § 1331 because in his Complaint, Plaintiff has alleged a federal question  
10 as the basis for his cause of action. Specifically, he asserts that Defendants have violated 42  
11 U.S.C. § 1980, 42 U.S.C. § 2000(d), and that Defendants took action against Plaintiff due to his  
12 ethnicity and national origin, in violation of Title VI of the Civil Rights Act of 1964.  
13 (Henderson Dec., ¶ 4, Exh. C.)

14 **B. Propriety and Timeliness of Removal**

15 This Superior Court action is removable to the U.S. District Court under 28 U.S.C.  
16 § 1446(b), which provides that a case may be removed within 30 days after receipt by the  
17 defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim  
18 for relief upon which such action is based. Defendant Securitas was served with the summons  
19 and complaint on August 2, 2007. This Notice of Removal has been filed within 30 days after  
20 receipt of such service as required.

21 **C. The U.S. District Court for the Western District of Washington is the Proper**  
22 **District Court**

23 This Court is the United States District Court for the district where the state action is  
24 currently pending and, thus, this is the appropriate Court for removal pursuant to 28 U.S.C.  
25 § 1441(a).

1 **D. All Defendants Agree to Removal**

2 Co-Defendant Greyhound Lines, Inc. has formally consented to removal of this action.  
3 (Henderson Dec., ¶ 7, Exh. F.)

4 WHEREFORE, Defendant Securitas prays that the above-entitled action now pending  
5 before the Superior Court of the State of Washington for King County, Cause No.  
6 07-2-25183-9 SEA, be removed to the United States District Court for the Eastern District of  
7 Washington.

8 DATED this 30th day of August, 2007.

9 BETTS, PATTERSON & MINES, P.S.

10   
11 By \_\_\_\_\_

12 S. Karen Bamberger, WSBA #18478  
13 Dana A. Henderson, WSBA #32507  
14 Attorneys for Defendant Securitas Security Services  
15 USA, Inc.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2007, I filed the foregoing with the Clerk of the Court via e-mail. I hereby certify that I have served by Legal Messenger the document to the following parties:

**Counsel for Plaintiff:**

Walter H. Olsen, Jr., WSBA #24462  
Khalil Khan, WSBA #36725  
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**Counsel for Defendant Greyhound Lines, Inc.:**

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s/Dana A. Henderson

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